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November 25, 2019

Via ECF

Honorable Gabriel W. Gorenstein  
Honorable J. Paul Oetken  
U.S. District Court, Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

MEMO ENDORSED

Re: *Jose Ramos v. JJDA Enterprises LLC et al*,  
Case No. 18 Civ. 10658 (JPO) (GWG)

Dear Judges Gorenstein and Oetken:

We represent Defendants in the above-captioned matter. We write on behalf of both parties to respectfully request an adjournment of the settlement conference scheduled before Judge Gorenstein on December 3, 2019 at 2:30 p.m., and all related deadlines. We also request an adjournment of the status conference now scheduled before Judge Oetken on December 13, 2019 at 12:30 p.m.

The parties jointly make this request because settlement discussions began last week and the parties wish to attempt to first resolve this matter informally, without incurring the cost of counsel attending mediation. This is our second adjournment request of both respective conferences.

We therefore request that the court order the following:

That the mediation before Judge Gorenstein currently scheduled for December 3, 2019 at 2:30 p.m. be adjourned to **January 30, 2020 at 2:30 p.m.**; and that all mediation-related deadlines be adjourned accordingly;

That the status conference now scheduled before Judge Oetken on December 13, 2019 at 12:30 p.m. be continued until on or after January 30, 2020, *excluding February 7, 10, or 11 when defense counsel will be out of state*; and that, consistent with ECF No. 31, all discovery deadlines continue to be stayed until further order of the Court.

Respectfully,

/s/

Jessica Shpall Rosen  
[JSR@GreenwaldLLP.com](mailto:JSR@GreenwaldLLP.com)

Cc: Anne Nacinovich  
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SO ORDERED, DATE 11/27/19  
GABRIEL W. GORENSTEIN  
UNITED STATES MAGISTRATE JUDGE

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Please Respond to the Orangeburg Office Above

Settlement conference adjourned  
to January 30, 2020 at 2:30 p.m.  
due January 24, 2020